

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

<p>Ellen S. Ewald,</p> <p style="text-align: center;">Plaintiff,</p> <p>Vs.</p> <p>Royal Norwegian Embassy and Gary Gandrud, Esq.,</p> <p style="text-align: center;">Defendants.</p>	<p style="text-align: center;">Civil No. 11-cv-02116 (SRN/SER)</p> <p style="text-align: center;"><u>PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT ROYAL NORWEGIAN EMBASSY</u></p>
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TO: DEFENDANT ABOVE-NAMED AND THEIR ATTORNEYS, FAEGRE & BENSON, SEAN SOMERMEYER, ESQ., DANIEL WILCZEK, ESQ., AND JOEL SCHROEDER, ESQ., 2200 WELLS FARGO CENTER, 90 SOUTH SEVENTH STREET, MINNEAPOLIS, MN 55402-3901

PLEASE TAKE NOTICE that Plaintiff Ellen S. Ewald ("Ewald") requests that Defendant Royal Norwegian Embassy ("Embassy") pursuant to Rule 33 of the Federal Rules of Civil Procedure, by counsel, hereby requests answers under oath within thirty (30) days from the date hereof to the following Interrogatories. Failure to provide information sought by these Interrogatories will result in objection at time of trial to any attempt to offer the same. These Interrogatories are to be deemed continuing so as to require supplemental answers if Defendant obtains additional information between the time answers are served and the time of the trial.

DEFINITIONS AND INSTRUCTIONS

1. "Plaintiff" includes and refers to Ellen S. Ewald, her attorneys, agents, or representatives.
2. "Defendant" or "Defendants" or "you" or "your" includes and refers to Royal Norwegian Embassy ("Embassy") and their attorneys, agents, representatives or predecessors or successors in interest.

3. "Person" and "individual" include not only natural persons but also corporations, companies, firms, partnerships, associations, joint ventures, governments, or agencies therefore, quasi-public entities, trusts, estates, and other entities.

4. "Document" includes:

a. All communications, letters, telegrams, cablegrams, correspondence, facsimiles, memoranda, records, reports, notes, drafts, proposals, minutes, affidavits, books, papers, magazines, newspaper articles, logs, calendars, diaries, journals, lists, brochures, pamphlets, literature, advertising, computations, tabulations, computer printouts, bills, statements, invoices, vouchers, bills of lading, schedules, purchase orders, contracts, agreements, books of original entry, accounts, checks, tape-recordings, Photostats, motion pictures, slides, photographs, sketches, drawings, charts, graphs, video recordings, transcripts, computer or other electronic or digital recordings, computer tapes or disks, e-mails, and other similar objects, or any other written, printed, recorded, or video matter or tangible thing on which or by which any words or phrases are affixed, displayed, recorded, or conveyed (e.g., post-it type notes);

b. Copies of such documents upon which any initialing, notation, or handwriting of any kind not appearing on the original;

c. Such documents, whether they were prepared by you, or your agents, employees, consultants, representatives, or attorneys, for their own use, your use, or for transmittal in any manner, or were received by any means by you; and

d. Such documents, wherever located, whether in the files of any agent, employee, consultant, representative, or attorney of yours, or in any file in your possession or direction or control.

5. "Communication" includes all correspondence, letters, telephone or other conversations, electronic or video mailings, facsimile, e-mails and other transmissions, and all other written or oral conveyances of documents or information between or among persons.

6. Whenever in these Interrogatories you are asked to identify a document, you shall designate the type of document and shall state:

a. Information sufficient to enable identification of the document, including its date, the name of the addressees, the name of the signor or signors, authors, the title or heading of the document;

b. The identity of the persons to whom the original and all copies were sent; and

c. The present or last known location or possessor of the original of the document and of each copy thereof.

7. Whenever in these discovery requests you are asked to identify or produce a document which is deemed by you to be properly withheld from production for inspection or copying on the ground of privilege or other protection, you shall provide a listing thereof by title or subject heading, date, author, addressee, and person copied, including a statement of the statutory privilege asserted, and other appropriate identifying information such that is able to assess the applicability and validation of the privilege asserted.

8. Whenever in these Interrogatories you are asked to identify a person, you shall state:

a. The person's name and present or last known residential address;

b. The person's present or last known business address;

c. The person's present or last known occupation, title, and employer; and

d. The person's occupation, title, and employer at the time of the event inquired about in these Interrogatories.

9. The singular form of a word, e.g., document or person, shall refer to the plural as well, and words used in the masculine gender also include the feminine.

10. Whenever in these Interrogatories you are asked to identify or describe an oral or written communication or other event, you shall set forth the following:

- a. Its substance;
- b. The date and time it occurred;
- c. The place it occurred (both sending and receiving, e.g., telephone conversation);
- d. The identity of each sender and recipient, for each participant, for each event;

and

e. The identity of each and all persons present when the conversation or event took place.

11. Whenever in these Interrogatories you are asked to "describe in detail" when used in reference to a factual situation or any allegation, you shall state with particularity all facts known to you, connected with, bearing upon, or relating in any way to matters of which inquiry is made.

12. Where you object that an Interrogatory is overly broad, burdensome, or oppressive, state facts or other evidence demonstrating the nature of the alleged burden.

INTERROGATORIES

INTERROGATORY NO. 1: Identify each and every person who drafted, was consulted, or otherwise took part in the preparation of answers to these Interrogatories or any document or other discovery requests served on Defendant in conjunction with this matter, including which interrogatory said person provided information for.

INTERROGATORY NO. 2: Identify all persons whom you claim or believe have knowledge or information relating to the allegations made or matters raised in your answer to any claim in this action, and for each such person, describe in detail the nature of his or her knowledge or information.

INTERROGATORY NO. 3: State the names, addresses, and employment of all persons with whom you have had conversations or communications regarding any of the matters or issues raised or alleged in your answer to any claim in this action as well as any counterclaims, and describe in detail the dates, places, and substance of all such conversations or communications.

INTERROGATORY NO. 4: Identify each expert whom you have retained, during the pendency or in anticipation of this litigation, to render an opinion on your behalf, and for each such expert, provide the individual's full name, title, current business address and telephone number, the area of his or her expertise, a detailed description of his or her background (e.g., education, experience, professional affiliations, certifications, publications), the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, and a summary of the grounds for each such opinion.

INTERROGATORY NO. 5: Identify all other witnesses expected to be called at trial and state the substance of facts to which each witness is expected to testify.

INTERROGATORY NO. 6: Identify and describe in detail all statements which were made by Defendant, or any of Defendant's personnel, to any other person regarding the recruitment, hiring and/or termination of Plaintiff's employment, and by whom and to whom these statements were made.

INTERROGATORY NO. 7: Describe in detail all representations made by Defendant to Plaintiff concerning the terms and/or conditions of her employment.

INTERROGATORY NO. 8: Identify and describe, including the salary or other compensation paid by Defendant, for health, dental, retirement, disability insurance, life insurance, 401K plan, or other benefits that Plaintiff received in connection with her employment, for the duration of Plaintiff's employment.

INTERROGATORY NO. 9: Identify and describe, including the payments or other compensation paid by Defendant, for salary, health, dental, retirement, disability insurance, life insurance, 401K plan, or other benefits provided by Defendant and/or made available to officers and employees at all the Norwegian Consulates and Embassies in the United States from 2007 to the present.

INTERROGATORY NO.10: Identify each person who participated in any way in the decision on the amount of salary and benefits paid to Anders Davidson and Ellen Ewald, and describe in detail how the decision was made and each and every factor considered in the decision making process. Provide documentation, if any, for each communication.

INTERROGATORY NO. 11: Identify each and every document known to you which you know or believe may contain facts or information related to the claims asserted in Plaintiff's Complaint or in Defendant's Answer.

INTERROGATORY NO. 12: Describe in detail the duties and responsibilities of the two positions of the Higher Education and Research Officer and the Innovation and Business Development officer at the Honorary Consulate General in Minneapolis from 2008 through 2011.

INTERROGATORY NO. 13: Identify all persons with whom Plaintiff's employment was discussed and the content of each conversation or communication. Provide documentation, if any, for all communications.

INTERROGATORY NO. 14: Describe in detail the basis for Defendant telling Plaintiff that "there was no professional reason for her to attend Science Week 2010" as admitted in Paragraph 49 of your Answer.

INTERROGATORY NO. 15: Identify each and every person who has participated in any kind of investigation on behalf of Defendant of the inequitable pay and/or incidents complained of by Plaintiff in this case and describe the facts learned through such investigation.

INTERROGATORY NO. 16: Identify all documents and state all facts that support your denial of the allegations contained in Paragraph 56 of Plaintiff's Complaint, as reflected in Paragraph 56 of your Answer.

INTERROGATORY NO. 17: Identify by date, place, purpose, funding source, and amount expended for travel by Anders Davidson as the Innovation and Business Development Officer of the Honorary Consulate General in Minneapolis.

INTERROGATORY NO. 18: Identify all other claims of inequitable treatment of females, whether by compensation or otherwise, made to the Norwegian Foreign Service since 2002.

INTERROGATORY NO. 19: Identify the demographics of salary, position, gender, and experience for all positions in the Norwegian Foreign Service.

INTERROGATORY NO. 20: Identify all studies or analysis prepared which concern gender equity in the compensation of employees in the Norwegian Foreign Service.

Dated: August 2, 2012.

ENGELMEIER & UMANAH, PA

By: Susanne J. Fischer

Thomas E. Marshall (#155597)

Susanne J. Fischer (#285353)

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ATTORNEYS FOR PLAINTIFF

Ellen S. Ewald v. Royal Norwegian Embassy and Gary Gandrud, Esq.
Court File No.: 11-cv-02116
Our File No.: 1367-001

AFFIDAVIT OF SERVICE
Via Fax and U. S. Mail

I, Jackie Martin, being first duly sworn upon oath, deposes and says that on August 2, 2012, she served the attached:

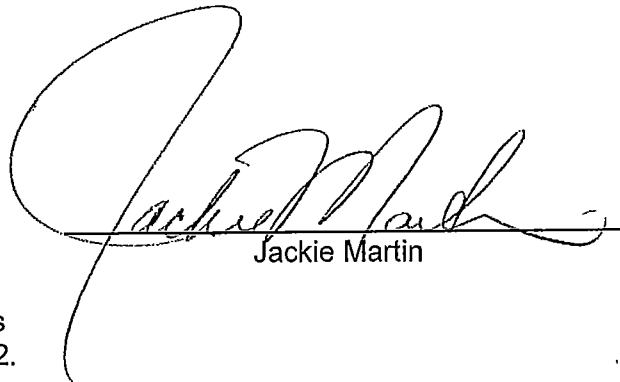
- 1) Plaintiff's First Set of Interrogatories to Defendant Royal Norwegian Embassy;
- 2) Plaintiff's First Set of Requests for Production of Documents to Defendant Royal Norwegian Embassy;
- 3) Plaintiff's Requests for Admissions to Defendant Royal Norwegian Embassy; and,

upon the attorneys named below, via fax and U. S. Mail, at the address given below, as follows:

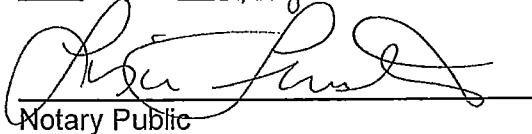
Daniel G. Wilczek, Esq.
Sean R. Somermeyer, Esq.
Joel Schroeder, Esq.
Faegre & Benson, LLP
90 South 7th Street, #2200
Minneapolis, MN 55402

Via Fax/U.S. Mail

Fax No.: 612-766-1600


Jackie Martin

Subscribed and sworn to before me this
2 day of August, 2012.


Notary Public

